# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

UNITED STATES (	OF AMERICA	*
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\* CAUSE NUMBER: 3:18-CR-00429-L

Plaintiff,

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versus

\*

SHAWNETTA LARUTH JONES,

\*

Defendant.

DEFENDANT SHAWNETTA JONES' UNOPPOSED MOTION FOR TRIAL CONTINUANCE

COMES NOW Defendant SHAWNETTA LARUTH JONES (hereinafter, "Defendant"), by and through her undersigned attorney who submits this, her Unopposed Motion for Trial Continuance in the above-entitled and -numbered cause of action. Defendant requests the Court hereby grant this Motion in all its particulars. For just cause, the Defendant would show this Court the following:

### SECTION NUMBER I

This case is currently set for a trial by jury on Tuesday, November 13, 2018, at 9:00 a.m.. The Defendant engaged undersigned counsel on September 24, 2017. Undersigned counsel did not receive Plaintiff's discovery until the week of October 1, 2018.

#### **SECTION NUMBER II**

A continuance is necessary in order to properly evaluate this case, conduct plea negotiations with Plaintiff, and determine whether Defendant's testimony is required/desired in the underlying State Court criminal proceeding.

### SECTION NUMBER III

Defendant is not currently in jail and this is Defendant's first request for a trial continuance.

This request for trial continuance is not sought for delay but so that justice may be done.

### **SECTION NUMBER IV**

Undersigned counsel conferred by telephone with the Assistant U.S. Attorney assigned to this matter on October 10, 2018 and he does not oppose this motion for trial continuance.

#### **PRAYER**

WHEREFORE, PREMISES CONSIDERED, Defendant prays this honorable Court will grant this Motion for Trial Continuance and for all general and equitable relief to which she is entitled.

Respectfully Submitted,

WILLIAM A. PIGG, PLLC

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Attorney for Defendant Shawnetta Laruth Jones

# **CERTIFICATE OF CONFERENCE**

I HEREBY CERTIFY that I conferred by telephone with Assistant U.S. Attorney Walt Junker on October 10, 2018 regarding the contents of this motion and that he has NO OPPOSITION to a continuance of the trial of this matter.

/s/ William A. Pigg

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the foregoing Motion for Trial Continuance on Assistant U.S. Attorney Walt Junker through the Court's electronic case filing system this 10<sup>th</sup> day October, 2018, in accordance with the Federal Rules of Criminal Procedure and the Local Rules of this Court.

/s/ William A. Pigg